



**Insurance and Real Estate Committee
PUBLIC HEARING
Tuesday, March 15, 2022**

**Connecticut Association of Health Plans
Testimony in Opposition to**

**H.B. No. 5386 AAC HEALTH INSURANCE COVERAGE FOR EPINEPHRINE CARTRIDGE
INJECTORS.**

The Connecticut Association of Health Plans urges caution in adopting H.B. 5386. The bill would limit any copays, deductibles, and coinsurance for epinephrine autoinjectors to \$25. While we appreciate the benefit of the legislation to consumers at the point-of-sale, unfortunately the proposal does nothing to address the actual excessive pricing of EpiPens – the brand name of epinephrine injectors.

Instead, the proposal shifts the burden of the cost from the out-of-pocket side of health insurance coverage to the premium side. Bills like H.B. 5386 incent pharmaceutical companies to increase the cost of life saving drugs like EpiPens because consumers using the product are mostly insulated from any impact. According to a 2017 JAMA Internal Medicine study, the out-of-pocket cost of epinephrine autoinjectors jumped nearly 124% from 2007 to 2014.

Furthermore, passage of this legislation will undermine the timeline for rate filings under the Affordable Care Act. Connecticut's Exchange is right now preparing their standard benefit designs and carriers are right now preparing their non-standard plan designs. Health carriers must then file their associated rates with the Department of Insurance. If any new mandates or other cost sharing provisions are adopted after the standard benefit design is finalized and rates are filed, then the Exchange and the carriers will have to reopen the entire process allowing for adjustments to the AV calculator, re-submittal of all templates and the refiling of all rates. The sheer volume of mandates and the other insurance provisions under consideration by the Committee add appreciable volatility to the overall process that is not conducive to an efficient, stable, and predictable insurance market.

We urge the Committee's opposition to H.B. 5386.